

UNITED STATES DISTRICT COURT

for the

Northern District of Indiana

Heidi Dannonne Brown

Plaintiff(s)

-v-

South Bend Housing Authority

Defendant(s)

Case No.

3:24-cv-00261-SJF

-FILED-

JAN 23 2025

At _____ M
Chanda J. Berta, Clerk
U.S. DISTRICT COURT
NORTHERN DISTRICT OF INDIANA

MOTION FOR ASSISTANCE WITH RECRUITING COUNSEL

I request the court's assistance recruiting counsel to represent me in this action. (Note: You may attach additional pages to this motion.)

I. Financial Status

Have you previously filed a "Request to Proceed in Forma Pauperis" (an IFP application)? Please check the appropriate box below:



I have previously filed an IFP application in this case, and it is a true and correct representation of my current financial status.



I have not previously filed an IFP application in this case and now attach an original IFP application showing my financial status.



I have previously filed an IFP application in this case, but my financial status has changed. I have attached a new IFP application showing my current financial status.

II. Attempts to Obtain Counsel

The law requires persons requesting assistance with recruiting counsel to first make a reasonable attempt to obtain counsel on their own or demonstrate that they have been effectively precluded from doing so. List all attorneys and/or law firms you have contacted to represent you in this case and their responses to your requests. If you have limited access to the telephone, mail, or other communication methods, or if you otherwise have had difficulty contacting attorneys, please explain.

PRO SE ASSISTANCE CENTER, INDIANA BAR ASSOCIATION

JONES LAW OFFICE (704 W. WASHINGTON ST.), NOTRE DAME

LEGAL CLINIC, C. NORRIS LAW GROUP, INDIANA Legal

SERVICES, VOLUNTEER LAWYER NETWORK (PRO BONO INDIANA),

BEN CRUMP LAW FIRM, NAACP LEGAL DEPARTMENT,

CITY OF SOUTH BEND LEGAL DEPARTMENT, McCUNE LAW GROUP,

and MANY MORE

III. Ability to Litigate the Case

1) Do you have any difficulty reading or writing English?

NOT THAT I'M AWARE OF, NO.

2) What is your educational background (including how far you went in school)?

ASSOCIATE of Applied Science

- 3) Do you have any physical or mental health issues that you believe affect your ability to litigate this case on your own? If so, what are they?

NO

- 4) Have you received any assistance with this case from others, including other inmates? If so, describe the assistance you have received and whether you will continue to receive it.

NO

- 5) List any other cases you have filed without counsel, and note whether the Court recruited counsel to assist you in any of those cases.

3:23-CV-01019-DRL-SJF Brown v. Janetary at Holy Cross,
 3:23-CV-01020-DRL-MLB Brown v. Brickyard Healthcare Fountainview
 CARE Center, 3:24-CV-00361-SJF Brown v. South Bend Housing Auct.,
 3:24-CV-00327-CCB-SJF Brown v. MARION Superior Court et al,
 3:24-CV-00377-DRL-MLB Brown v. South Bend Community School
 Corporation et al, 3:24-CV-00426-DRL-MLB Brown v. National
 Center for Missing and Exploited Children, 3:24-CV-00560-CCB-SJF
 Brown v St. Joseph County Board of Commissioners, 3:24-CV-00753-DRL-S,
 Brown v Indianapolis Public Schools et al

- 6) Describe any other factors you believe are relevant to your ability to litigate this case on your own.

I believe time, financial barriers, interpretation barriers,
 language barriers (most documents and court proceeding
 use fluent Latin), and lack of knowledge to all
 pro se litigant laws.

cont.
below

3:24-CV-00853-CCB-SJF Brown v South Bend Clinic et al,
 3:24-CV-00871-CCB-SJF Brown v. California Department of fair
 Housing and Employment et al, 3:24-CV-00906-DRL-SJF, Brown v.
 Indiana Professional Licensing Agency, 3:24-CV-00953-DRL-SJF
 Brown v Indiana Professional Licensing Agency et al


IV. Requirements for the Recruitment of Counsel

By filing this motion, I agree to the following conditions:

- While I set the objectives of the litigation, I acknowledge it is usually counsel's choice as to the strategies used to accomplish that objective.
- I will fully cooperate with recruited counsel. If I do not do so, I understand that recruited counsel may withdraw.
- I understand that counsel is not responsible for paying the costs associated with my lawsuit.
- I understand that I am not entitled to free legal counsel and that recruited counsel may require me to enter into a contingency fee agreement in order to represent me in this action.
- I understand that a portion of any monetary recovery (not to exceed 25%) may be used to satisfy the amount of attorney's fees awarded under 42 U.S.C. § 1988. This requirement is imposed by the Prison Litigation Reform Act, 42 U.S.C. § 1997e(d).
- I understand that even if the Court grants this motion, I will receive counsel only if an attorney volunteers to take my case and that there is no guarantee that an attorney will volunteer to represent me.
- I understand that if my answers in this motion or in my IFP application are false, I may be subject to sanctions, including the dismissal of my case.

I declare under penalties for perjury that the above statements are true and correct:

01/22/25
01/17/2025 *urk*
Date


Signature - Signed Under Penalty for Perjury